

Application Serial No.: 10/671,044  
Filing Date: September 24, 2003

Reply to Office action of: February 13, 2006  
Attorney Docket No.: JP920020131US1

### **REMARKS**

This Amendment is in response to the Office Action of February 13, 2006. Applicants respectfully submit that the claims 1-3 have been amended, claims 4-20 have been canceled without prejudice, and new claims 21-37 have been added, to more clearly point out the present invention. All the claims presently on file are in condition for allowance or appeal.

### **THE CLAIMS**

#### **REJECTION UNDER 325 USC 102**

Claims 1-3 and 7-20 are rejected under 35 U.S.C. 102(e) as being anticipated by Chang et al. (US 2004/0119740). (hereinafter "Chang"). Applicants respectfully submit that Chang does not disclose all the elements and limitations of the rejected claims. Consequently, the claims on file are not anticipated under 35 U.S.C. 102, and the allowance of these claims is earnestly solicited. In support of this position, Applicants submit the following arguments:

#### **A. Legal Standard for Lack of Novelty (Anticipation)**

The standard for lack of novelty, that is, for "anticipation," is one of strict identity. To anticipate a claim for a patent, a single prior source must contain all its essential elements, and the burden of proving such anticipation is on the party making such assertion of anticipation.

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Anticipation cannot be shown by combining more than one reference to show the elements of the claimed invention. The amount of newness and usefulness need only be minuscule to avoid a finding of lack of novelty.

The following are two court opinions in support of Applicants' position of non anticipation, with emphasis added for clarity purposes:

- "Anticipation under Section 102 can be found only if a reference shows exactly what is claimed; where there are differences between the reference disclosures and the claim, a rejection must be based on obviousness under Section 103." *Titanium Metals Corp. v. Banner*, 778 F.2d 775, 227 USPQ 773 (Fed. Cir. 1985).
- "Absence from a cited reference of any element of a claim of a patent negates anticipation of that claim by the reference." *Kloster Speedsteel AB v. Crucible Inc.*, 793 F.2d 1565, 230 USPQ 81 (Fed. Cir. 1986), on rehearing, 231 USPQ 160 (Fed. Cir. 1986).

#### **B. Independent Claims 1, 26, and 34 in Light of Chang**

Chang generally describes a method for viewing and responding to electronic messages. When an electronic message is displayed, a portion of the electronic message is elided to aid in the viewing experience. The method generally includes identifying an extraneous portion within a second electronic message; eliding the extraneous portion within the second electronic message; and generating the first electronic message wherein the first electronic message includes the second electronic message with the extraneous portion of the second electronic message suppressed.

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However, Chang does not describe a process or a system for displaying documents by extracting a relationship between a plurality of documents in the group of documents and generating a virtual document from a plurality of documents. In addition, Chang does not disclose extracting a relationship between the documents of the virtual document, to form a section group from the group of documents that are selected according to the extracted relationship. Furthermore, Chang does not describe displayed the virtual document according to the expansion condition associated with the documents.

Contrary to Chang, and as explained in paragraph [0059] of the present application, the virtual document is generated by combining documents within a thread. A relation between the documents is reflected as a relation between sections in the virtual document, thereby enabling an easy grasp of the relation between the documents and obtaining a virtual document where only documents in a required collection can be viewed at a time. More specifically, a relation between documents in a thread is extracted as a tree structure, for example, and a section group having the same tree structure is generated in a virtual document on the basis of the extracted tree structure before mapping of the relation between the documents. Thereafter, contents of documents corresponding to respective sections are mapped and displayed. In this manner, the mechanism for mapping a plurality of documents into a single virtual document is provided in this embodiment. The display in this embodiment is not a document list, but the content itself of the virtual combined

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document can be seen. Furthermore, even if a section is treated as an object embedded in a higher sentence as one in a nested structure, for example, relations between independent documents can be mapped into a single document without expanding a text of the higher document.

Consequently, based on the foregoing legal authorities governing the anticipation standard, claim 1 is not anticipated by Chang and the allowance of this claim and the claims dependent thereon is earnestly solicited.

Independent claims 26 and 34 are also allowable for containing a similar subject matter to that of claim 1. Therefore, claims 26 and 34 and the claims dependent thereon are also allowable.

### **REJECTION UNDER 325 USC 103**

Claims 4-6 were rejected under 35 U.S.C. 103(a) as being unpatentable over Chang in view of Yeager (US 6167402). Applicants respectfully submit that this rejection has now become moot in view of the cancellation of claims 4-6.

### **CONCLUSION**

All the claims presently on file in the present application are in condition for immediate allowance, and such action is respectfully requested. If it is felt for any reason that direct communication would serve to advance

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Attorney Docket No.: JP920020131US1

prosecution of this case to finality, the Examiner is invited to call the undersigned at the below-listed telephone number.

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Respectfully submitted,



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